

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

**Hearing Date & Time:
November 9, 2010 at 10:00 a.m.**

In re

Chapter 11

**THREE AMIGOS SJL INC.
d/b/a Cheetahs Gentleman's Club**

Case No.: 10-10924(jmp)

Debtor.

**SAM ZHERKA AND SHIRELL WEISBLAT A/K/A SHRIELL
WEISBLAT, EQUITY HOLDERS OF THE DEBTOR'S, OBJECTION
TO SALE MOTION**

**TO THE HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE:**

Sam Zherka ("Zherka") and Shirell Weisblat a/k/a Shriell Weisblat ("Weisblat"), equity holders of the Debtor (collectively, the "Equity Holders"), by their attorneys, the Law Offices of David Carlebach, Esq., as and for their Objection to the Debtor's Emergency Motion to Sell the Assets of the Debtor, represent as follows:

1. The Equity Holders do not Object in principal to the concept of the Sale with a full reservation of all of their rights and remedies against the Debtor.

2. The fact that the debtor intended on selling prior to November 14, was embedded in one line in the application and was not set forth in the Order to Show Cause or the other pleadings. The Equity Holders only noticed that all important point because of the Objection filed by the City of New York.

3. Not only is that a complete abrogation of all of the notice provisions of the Bankruptcy Code it is simply unconscionable to sell all of the Debtor's assets without proper Notice. The sale needs to be conducted in a normal fashion whereby all of the potential bidders will be brought into the tent. This process is exclusionary, unfair and is designed to favor the stalking horse bidder.

CONCLUSION

WHEREFORE, the Equity Holders respectfully request that the Court deny the emergency application insofar as it calls for improper notice under the code and grant such other, further and different relief as is just and proper.

Dated: New York, New York

November 9, 2010

LAW OFFICES OF DAVID CARLEBACH , ESQ.

Attorneys for Equity Holders of the Debtor

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By: s/ David Carlebach

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